

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

KRISTINA SALINAS, as guardian and	§	
conservator of and for KELLY MASTEN,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	CIVIL ACTION NO. 4:24-cv-00318-P
TARRANT COUNTY, TEXAS	§	
	§	JURY DEMANDED
Defendant.	§	

JOINT MOTION TO STAY ALL DEADLINES  
AND SETTINGS PENDING POTENTIAL SETTLEMENT

TO THE HONORABLE UNITED STATES DISTRICT COURT:

The Parties mediated this case in person, with the exception of Plaintiff, Kristina Salinas appearing remotely as authorized by the court, with Jason Nash on September 16, 2024. The parties reached an impasse. However, the mediator made a proposal with a September 19, 2024 deadline. Both parties accepted the mediator's proposal.

The accepted proposal is contingent on approval by the Tarrant County Commissioner's Court, approval by the appropriate chancery court in Mississippi with jurisdiction over Plaintiff as guardian for Kelly Masten, and a Medicaid lien not exceeding a certain dollar amount. The parties expect to be able to meet these contingencies. Defendant's counsel will need to continue working with the Tarrant County Commissioner's Court regarding approval, and Plaintiff's counsel will need to address the apparent outstanding Medicaid lien as well as work with Mississippi counsel representing Plaintiff in the guardianship proceeding. Plaintiff's counsel is currently unaware of the length of time it will take to potentially obtain approval in the Mississippi court. Regardless,

both Plaintiff's counsel and Defendant's counsel will work promptly and diligently to meet the contingencies. The parties therefore jointly request that the court stay all deadlines and settings in this case pending consummation of the proposed settlement, and establish a deadline not earlier than sixty days after the date this motion is filed for the parties to either (1) submit appropriate dismissal documents or (2) notify the court of any issues with meeting the proposed settlement contingencies.

Respectfully submitted,

/s/ T. Dean Malone

T. Dean Malone

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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2024 I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court, and the electronic case filing system sent a notice of electronic filing to the following attorneys:

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